

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN**

---

*In re:*

RIDGETOP G, LLC,

Case No. 21-11388-cjf

Debtor.

---

**MOTION FOR ORDER DIRECTING FILING OF CLAIMS AND SETTING BAR DATE  
OF RIDGETOP AG, LLC**

---

Ridgetop AG, LLC, the debtor herein (the “Debtor”), by its attorneys, Krekeler Strother, S.C., moves the Court for an order: (1) directing the filing of claims by all creditors whose claims or interests are listed by the Debtor, including those whose claims the Debtor has listed as disputed; (2) directing the filing of claims by governmental units as defined in 11U.S.C. § 101(27); (3) and establishing a bar date for such filings. In support of this Motion, the Debtor respectfully represents as follows:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334 and 157. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. On June 28, 2021, (the “Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

3. The Debtor is authorized to continue to operate its business and manage its property as a debtor-in-possession pursuant to Sections 1107 and 1008 of the Bankruptcy Code.

4. No trustee, examiner, or official committee of unsecured creditors has been appointed in this Chapter 11 case.

5. In order that the Debtor complete a Disclosure Statement and provide interested parties with adequate information to properly consider a proposed Plan of Reorganization, the claims of all parties must be known, including those claims which are disputed.

6. In order to proceed promptly in this action, all creditors, other than governmental units as defined by 11 U.S.C. § 101(27), whose claims were scheduled as disputed must be required to file Proofs of Claim within such time as the Court may fix, with the failure to do so resulting in such creditors not being treated as creditors for the purposes of voting and distribution in this matter in accordance with FRBP 3003(c)(2).

7. A reasonable time for such creditors to file such Proofs of Claim is twenty-one (21) days after mailing notice of such bar date to such creditors.

8. Additionally, in accordance with 11 U.S.C. § 502(b)(9) and FRBP 3002(c)(1) and 3003(c)(3), governmental units, as defined in 11 U.S.C. Section 101(27), were to file claims not later than 180 days after the date of the order for relief. That date has expired. Therefore, a reasonable time for governmental units to file such Proofs of Claim is twenty-one (21) days after mailing notice of such bar date to such governmental units.

**WHEREFORE**, Ridgetop AG, LLC, respectfully requests that this Court enter an order setting the deadline by which all creditors, including governmental units, are to file Proofs of Claim; and ordering that the failure to file a claim within twenty-one days after the mailing of Notice of Bar Date shall result in that claim being barred if not timely filed, with the result that such creditor shall not be treated as a creditor for the purposes of voting and distribution in this Chapter11 Case.

Dated: July 9th, 2021

**KREKELER STROTHER, S.C.**

*Signed electronically: Michelle A. Angell*

By: \_\_\_\_\_

Michelle A. Angell, State Bar No. 1063924

Carrie S. Werle, State Bar No. 1088715

*Proposed Attorneys for the Debtor,  
Ridgetop AG, LLC*

2901 W. Beltline Highway, #301  
Madison, WI 53713  
Phone: (608) 258-8555  
Fax: (608) 258-8299  
[mangell@ks-lawfirm.com](mailto:mangell@ks-lawfirm.com)  
[cwerle@ks-lawfirm.com](mailto:cwerle@ks-lawfirm.com)